

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,)	
)	Crim. No. 23cr10186-ADB
v.)	
)	
ZION FORD,)	
)	
Defendant.)	

**GOVERNMENT'S OPPOSITION TO DEFENDANT'S MOTION FOR TEMPORARY
RELEASE**

The Government opposes Defendant Zion Ford's motion for temporary release. Defendant is presently charged with conspiring to engage in racketeering activities as part of the Heath Street Gang. As part of the racketeering charge, the Heath Street Gang is charged with committing various violent crimes, including multiple shootings and attempted shootings, against rival street gangs. In turn, the Heath Street Gang has been the target of violence from rival criminal street gangs. The Government believes that it can prove that Defendant has been involved in acts of violence as a member/associate of the Heath Street Gang including one shooting (which resulted in a death) and a second attempted shooting. The shooting and attempted shooting targeted members of two separate rival street gangs operating in the Boston area. Given Defendant's violent acts on behalf of the Heath Street Gang, Defendant would present a clear danger to the community should he abscond while on release. In addition, if Defendant's release is to be accomplished through individuals accompanying Defendant and ensuring his return, these individuals would in turn be placed in danger due to the possibility of retaliatory violence from other rival street gangs targeting Defendant.

In light of the above, the Government opposes Defendant's motion for temporary release.

Respectfully submitted,

JOSHUA S. LEVY
Acting United States Attorney

By: /s/ Michael Crowley
MICHAEL CROWLEY
Assistant U.S. Attorney

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By: /s/ Michael Crowley
MICHAEL J. CROWLEY
Assistant U.S. Attorney